

EXHIBIT 1

Subject: Angulo et al v. Providence et al - court order on discovery
Date: Friday, June 2, 2023 at 9:01:13 AM Pacific Daylight Time
From: Beth Bollinger
To: Eric Norman, Michelle L. Hyer, Esther W. Wong, Morgan A. Ferrario, Bill Gilbert, Hannah Arnold, Joel Chavez, Rachel Cook
Attachments: 83 - 5.23.2023 Order Granting Subpoena Request to MultiCare.pdf, image001.png, image002.png, image003.png

Dear Eric and Michelle,

I wanted to let you know that the federal judge in the Angulo v. Providence class action – Judge Robart – has issued an order allowing us to issue discovery to MultiCare so that we can obtain residency and citizenship information for the MultiCare patients who are covered in the Providence case (I think you are aware of the possibility of this, since you already sent us copies of the original order and our supplemental briefing in that case).

I'm attaching a copy of the Judge Robart's new Order here.

We are in the process of determining release of Providence patient contact information, given privacy laws – and presume we will propose a similar solution to be applied for MultiCare patients. We would like to speak with you both about next steps before formally issuing a subpoena to MultiCare to see if we can ascertain the easiest method for us all to retrieve the jurisdictional discovery needed.

Thanks in advance for your assistance – let us know your availability next week to talk. Best, Beth

Beth Bollinger, Esq.

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Subject: RE: Angulo et al v. Providence et al - court order on discovery
Date: Monday, June 5, 2023 at 1:29:49 PM Pacific Daylight Time
From: Eric A. Norman
To: Beth Bollinger, Bill Gilbert, Hannah Arnold, Joel Chavez, Rachel Cook
CC: Morgan A. Ferrario, Esther W. Wong, Michelle L. Hyer, Ian R. Ducey
Attachments: image004.png, image006.png, image005.jpg, image008.png, image010.jpg, image012.png

Beth,

You can send me the subpoena. We will be moving to quash per Judge Robart's order:

³ The court takes no present position on whether MultiCare must respond to the subpoena. See Fed. R. Civ. P. 45(d)(3)(A)(iii) ("On timely motion, the court . . . must quash or modify a subpoena that requires disclosure of privileged or other protected matter"); *Herrera v. City of Los Angeles*, Case No. 2:16-cv-2719-DSF (SKx), 2017 WL 8811268, at *2 (C.D. Cal. March 9, 2017) (quashing subpoena that sought information protected by the Health Insurance Portability & Accountability Act).

Without waiver of any objections to the subpoena, what third party administrator are you using in Angulo? I know Providence is not releasing patient names directly to plaintiffs or their counsel.

Thanks,

Eric A. Norman, Attorney
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FAVROS Law will be moving to a new Seattle location (address below). Please update your records accordingly. *Phone, email, and fax will remain unchanged.

Effective June 12, 2023 our new address will be:
3131 Elliott Avenue, Suite 300
Seattle, WA 98121

Subject: Re: Angulo et al v. Providence et al - court order on discovery
Date: Monday, June 5, 2023 at 1:38:19 PM Pacific Daylight Time
From: Beth Bollinger
To: Eric A. Norman, Bill Gilbert, Hannah Arnold, Joel Chavez, Rachel Cook
CC: Morgan A. Ferrario, Esther W. Wong, Michelle L. Hyer, Ian R. Ducey
Attachments: image001.png, image002.png, image003.png, image004.jpg, image005.png, image006.png, image007.jpg, image008.png

I've begun, but have not completed, the subpoena since we are talking to you in a half hour. We can send it to you after we talk and once it is finalized.

With Providence, we are filing with the Court no later than the end of next week – either with a joint proposal or with separate proposals and a joint statement on different approaches. We are investigating third party administrators and are getting a bid from Walt's Mailing Service here in Spokane, who has done a lot of class action work for firms around here, including Lukins & Annis.

Talk to you soon, Beth

Beth Bollinger, Esq.

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From: Eric A. Norman <eric@favros.com>
Date: Monday, June 5, 2023 at 1:29 PM
To: Beth Bollinger <beth@wagilbert.com>, Bill Gilbert <bill@wagilbert.com>, Hannah Arnold <hannah@wagilbert.com>, Joel Chavez <joel@wagilbert.com>, Rachel Cook <rachel@wagilbert.com>
Cc: Morgan A. Ferrario <morgan@favros.com>, Esther W. Wong <esther@favros.com>, Michelle L. Hyer <michelleh@favros.com>, Ian R. Ducey <ian@favros.com>
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